



HEPWORTH, GERSHBAUM & ROTH, PLLC.
192 LEXINGTON AVENUE, SUITE 802, NEW YORK, NEW YORK 10016
HGRLAWYERS.COM T: (212) 545-1199 F: (212) 532-3801

June 14, 2017

Via ECF Only

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Thind v. Healthfirst, Inc. et al.*
1:14-cv-09539

Dear Judge Schofield:

This firm represents Kanwarpreet Thind and the Facilitated Enrollers in the above-referenced wage and hour matter. We write in furtherance of this Court's order as it relates to Collective B1. *See* Dkt. No. 308.

As the Court is aware, in opposition to Defendants' Motion to Decertify Collective B, on June 2, 2016 Plaintiff made a cross motion to amend the complaint to identify Collective B1 as a distinct subclass; this Application was granted on December 9, 2016. *See* Dkt. No. 274. In addition, on May 18, 2017, the Court ordered, following a joint submission by the parties that "Collective A and B1 shall move forward as two separate actions." *See* Dkt. No. 308.

As the Court has already determined (1) that Collective A and B1 should proceed as two separate actions (*see* Dkt. No. 308); and (2) that Plaintiff may file a Second Amended Complaint to identify Collective B1 as a distinct subclass consistent with its December 9, 2016 Opinion, the undersigned intends to file a Second Amended Complaint, rather than a motion to amend, as directed by the Court in Dkt. No. 274 on or before June 16, 2017. The undersigned contacted all parties in advance of filing the instant letter all of which confirmed Plaintiffs' assessment as to the Court's December 9, 2016 Order and no party objected.

Should the Court have questions or concerns, please do not hesitate to contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Rebecca S. Predovan".

Rebecca S. Predovan, Esq.

C: Counsel of Record (*via ECF*)